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Via Electronic Filing

The Honorable Taryn A. Merkl, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Gonzales et al v. Black Thai Inc. et al*
Case No.: 1:21-cv-00118-ENV-TAM

Dear Honorable Magistrate Judge Merkl:

This law firm represents Defendants Black Thai Inc. (d/b/a Black Thai), Golden Thai Inc. (d/b/a Golden Thai), and John Vasconez (collectively, the “Defendants”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves as a request to extend the Fact discovery completion deadline of March 17, 2021 to, through and including, 45-days following the completion of the upcoming mediation.

This is the third request of its nature. If granted, this request would not affect any other scheduled deadlines. This request is made on consent of Plaintiff’s counsel.

The basis of this request is that Defendants respectfully wish to reserve the right to take depositions if the upcoming mediation is not successful.

In light of the foregoing, it is respectfully requested that the Court extend the fact discovery completion deadline of March 17, 2021 to, through and including, 45-days following the completion of the upcoming mediation, currently scheduled to take place on April 14, 2022.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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